



5775 PEACHTREE-DUNWOODY RD. • BLDG. G, STE. 500 • ATLANTA, GEORGIA 30342
(404) 252-3663 • FAX (404) 252-0774 • E-mail: ifac@kellencompany.com

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Division of Dockets Management (HFA-305)
Food and Drug Administration (FDA)
5630 Fishers Lane, rm. 1061
Rockville, MD 20852

RE: Docket No. 1998N-0359 Program Priorities in the Center for Food Safety
and Applied Nutrition; Request for Comments

The International Food Additives Council (IFAC) is an international trade organization representing companies that produce high quality substances used worldwide as food additives. IFAC appreciates the time and resources being dedicated to food security and food safety and supports these efforts.

Food Chemicals Codex (FCC) is an important element in "Ensuring Food Safety and Defense." IFAC has long valued the information published in the FCC. This compendium, published by the Institute of Medicine of the National Academies and long supported by FDA, contains monographs on the identity and purity of a wide variety of food additives. FCC monographs are valuable tools in consumer protection. FCC assists regulatory agencies and the regulated industries producing and using food additives in correctly identifying food additives. This ensures that food additives are safe for human consumption and that they adhere to all specifications for the product so labeled.

According to the CFSAN 2005 Program Priorities, "3.1.1c Develop a proposed rule to adopt the specifications in the most recent edition of the Food Chemicals Codex as appropriate" is a Priority Level B for 2005. IFAC urges FDA to adopt monographs in the latest edition of the FCC and its supplements as official by reference unless otherwise noted and that this become an "A-list" priority in 2006. As IFAC has previously commented, such action would be in harmony with the regulatory agencies in Australia, Canada and New Zealand where the specifications in the FCC and its supplements are official.

In light of the importance of FCC as described above, IFAC urges FDA to again fully fund the FCC project with no or very limited interruption in the schedule.

In addition, CFSAN's active participation in the Codex Alimentarius Food Standards Programme is extremely important to IFAC. IFAC strongly supports FDA's continued participation and leadership in Codex Alimentarius, its committees and related activities.

IFAC appreciates the opportunity to comment on CFSAN's 2006 priorities.

Respectfully submitted,

Lyn O'Brien Nabors

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President